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U.S. DISTRICT COURT
DISTRICT OF MARYLAND

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December 12, 2002

The Honorable J. Frederick Motz
United States District Court
for the District of Maryland
United States Courthouse
101 West Lombard Street
Baltimore, MD 21201

Re: Pure Water Committee of Western Maryland, Inc., et al. v.
Mayor & City Council of Cumberland, Maryland, et al.
Case No. JFM 01 CV 2611

Dear Judge Motz:

The undersigned counsel representing the Defendants in the above-referenced case are writing to ask for the Court to establish a new discovery schedule in the above-referenced case. The case was initially filed against the City of Cumberland and the City of Frostburg and after undertaking discovery, the Plaintiffs added LaVale Sanitary Commission and Allegany County, Maryland as additional Defendants. Those Defendants have now filed responsive pleadings and we are asking the Court to establish a new schedule for proceedings in the case.

We are asking the Court to enter the following schedule:

January 1, 2003 - deadline for Plaintiffs to name any additional experts;

February 1, 2003 - deadline for Defendants to name expert witnesses;

March 1, 2003 - discovery closes

March 15, 2003 - deadlines for Motions for Summary Judgment

This proposed discovery schedule has been forwarded to counsel for the Plaintiffs for their approval, but they have not responded indicating either an objection or approval of the proposed schedule. Nonetheless, we are asking to have this schedule established now to govern further proceedings in this case.

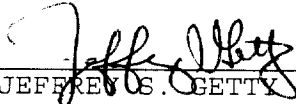
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Thank you for your attention to this matter.

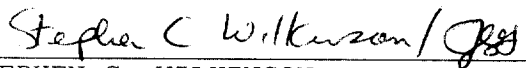
Very truly yours,

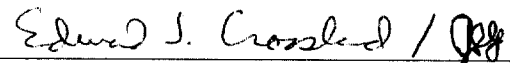
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By


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JSG/fle

cc: William J. Trozzo, Esquire

